

Sarah E. Josephson, Esq.
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Attorneys for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA**

TRUSTEES of the ALASKA TROWEL TRADES
PENSION AND APPRENTICESHIP TRUST FUNDS,
and the ALASKA LABORERS HEALTH AND
SECURITY FUND,

Plaintiffs,

Case No. 3:05-CV-141-RRB

vs.

GENERAL CONCRETE, INC.,

Defendant.

AFFIDAVIT OF SARAH E. JOSEPHSON

STATE OF ALASKA)
)
)ss.
THIRD JUDICIAL DISTRICT)

Sarah E. Josephson, being first duly sworn, deposes and states as follows:

1. I am employed by the firm of Jermain, Dunnagan & Owens, P.C., counsel to plaintiffs, and have knowledge of the facts to which I attest herein.
2. Attached hereto as Exhibit 1 are true and correct copies of the billing statements maintained by Jermain, Dunnagan & Owens for this client and this matter.

3. At all times during this litigation, the billing rate of attorneys involved in this matter was \$150.00 - \$175.00 per hour.

4. Three paralegals assisted in this action. Their time is billed at an hourly rate of \$95.00 - \$110.00 per hour.

5. One law clerk assisted in this action. His time is billed at an hourly rate of \$85.00 per hour.

6. Counsel, paralegals and the law clerk spent 59.0 hours working on collections for contributions owing. Of those, 17.3 hours were spent by paralegals, 1.8 by law clerk; and 39.9 hours were spent by attorneys.

7. The rates of other attorneys practicing in the area of ERISA, with whom I am aware, range from \$140 - \$195 per hour.

8. In prosecuting this cause of action, counsel and paralegal for the plaintiffs were required to perform the following tasks:

- a. investigate background facts; prepare various demands and correspondence;
- b. review records and compute the status of the delinquency;
- c. prepare and file a complaint;
- d. conduct factual and legal research regarding coverage;
- e. prepare and file an application for entry of default judgment and a motion for default judgment;
- f. prepare and file a motion for attorneys' fees; and
- g. In addition, an extensive amount of time was spent trying to resolve this case with General Concrete.

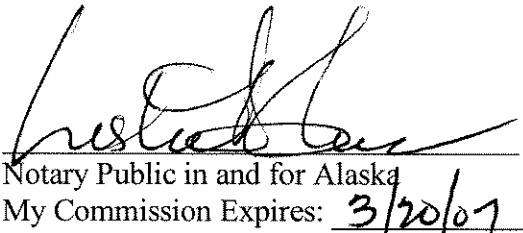
9. All of the foregoing activities of counsel, paralegals and the law clerk represent a reasonable effort in the prosecution of this case.

FURTHER YOUR AFFIANT SAYETH NAUGHT.

DATED this 22 day of May, 2006.

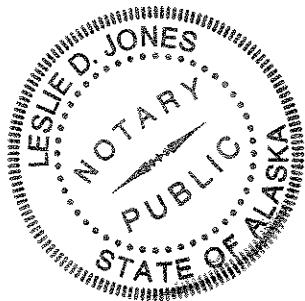
By: 
Sarah E. Josephson

SUBSCRIBED AND SWORN to or affirmed before me at Anchorage, Alaska, on this 22 day of May, 2006.


Notary Public in and for Alaska

My Commission Expires: 3/20/01

#116485



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